

Exhibit “A”

Netanel Newberger

From: Michael Mule
Sent: Wednesday, September 25, 2024 11:49 AM
To: Matthew Feinman; Matin Emouna
Cc: Netanel Newberger; Kyle Monaghan; James Orioli; Michael Mule
Subject: RE: AutoExpo Ent Inc., et al. v. Omid Elyahou, et al.; Case No.: 2-23-cv-9249 (OEM)(ST)

Matt and Matin,

Thank you for your emails. Your objections are noted. There is nothing to meet and confer about.

Very truly yours,
Mike

Michael C. Mulè, Esq.
Partner
Milman Labuda Law Group, PLLC
3000 Marcus Avenue, Ste. 3W8
Lake Success, NY 11042
michaelmule@mllaborlaw.com
516 303-1442 office
516 328-0082 fax

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From: Matthew Feinman <mfeinman@schohlaw.com>
Sent: Wednesday, September 25, 2024 10:45 AM
To: Michael Mule <MichaelMule@mllaborlaw.com>; Matin Emouna <memouna@emiklaw.com>
Cc: Netanel Newberger <netanel@mmmlaborlaw.com>; Kyle Monaghan <Kyle@mllaborlaw.com>
Subject: Re: AutoExpo Ent Inc., et al. v. Omid Elyahou, et al.; Case No.: 2-23-cv-9249 (OEM)(ST)

Michael,

We object to the joint status report and your proposed amended complaint. We are available to meet and confer.

Thanks,
Matt

From: Michael Mule <MichaelMule@mllaborlaw.com>
Sent: Tuesday, September 24, 2024 4:40 PM
To: Matthew Feinman <mfeinman@schohlaw.com>; Matin Emouna <memouna@emiklaw.com>

Cc: Michael Mule <MichaelMule@mllaborlaw.com>; Netanel Newberger <netanel@mmmlaborlaw.com>; Kyle Monaghan <Kyle@mllaborlaw.com>
Subject: AutoExpo Ent Inc., et al. v. Omid Elyahou, et al.; Case No.: 2-23-cv-9249 (OEM)(ST)

Counselors:

Attached please find a draft joint status report which we intend to submit to Judge Tiscione by noon tomorrow. Please include your portion of the letter, if any.

Also, please advise if you consent to our anticipated motion for leave to amend the pleadings to add a party and to assert ERISA claims against Omid Elyahou and Fazeeda Kassim. Attached is a redlined version of the complaint. We intend to file that motion by noon tomorrow as well.

We thank you for your attention to this matter.

Very truly yours,

Michael C. Mulè, Esq.

Partner

Milman Labuda Law Group, PLLC

3000 Marcus Avenue, Ste. 3W8

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Netanel Newberger

From: Matin Emouna <memouna@emiklaw.com>
Sent: Tuesday, September 24, 2024 5:33 PM
To: Michael Mule
Cc: mfeinman@scohnlaw.com; Netanel Newberger; Kyle Monaghan
Subject: Re: AutoExpo Ent Inc., et al. v. Omid Elyahou, et al.; Case No.: 2-23-cv-9249 (OEM)(ST)
Attachments: 2024-09-24 Joint Status Report (Draft).docx; 2024-09-23 AutoExpo Amended Complaint (REDLINED).pdf

Dear Mr. Mule

Hope this correspondence finds you well. As you are aware I represent Omid Elyahou and Simpsocial LLC, in the aforementioned matter.

Please be advised that I am currently traveling in Bratislava, Slovakia for an international extradition matter and have limited access to my phone and email.

In the meantime, please note my clients absolute objection to the filing of (a) your Joint Status Report and (b) consenting to having the plaintiff Amend the Complaint.

As I am traveling, I strongly suggest having a Meet and Confer on Sunday September - 2024 or another date mutually convenient to the parties so long as same does not interfere with the Jewish Holidays.

In the event you believe this matter cannot wait until my return, I suggest that you contact Matt Feinman, Esq. , who represents the co-defendants.

This letter is without prejudice to any rights or remedies available to Omid Elyahou and Simpsocial LLC, all of which are expressly reserved and none of which are waived.

I look forward to addressing this letter with you at our next mutually planned conference.

Very truly

Matin Emouna

Sent from my iPhone

On Sep 24, 2024, at 10:40 PM, Michael Mule <MichaelMule@mlaborlaw.com> wrote:

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Very truly yours,

Michael C. Mulè, Esq.
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